

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
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This document relates to:

Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al., 1:04-cv-01076 (GBD)(SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF MOTION TO ADD
ADDITIONAL PLAINTIFFS AGAINST THE TALIBAN**

I, Jerry S. Goldman, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a shareholder at Anderson Kill P.C., attorneys for Plaintiffs the Estate of John P. O'Neill, Sr., John P. O'Neill, Jr., Christine O'Neill, Carol O'Neill, the Estate of Dorothy O'Neill ("O'Neill Plaintiffs"); Plaintiffs added as parties pursuant to the Court's May 4, 2022, June 15, 2022, June 28, 2022, August 30, 2022, October 31, 2022, and May 28, 2025 Orders (ECF Nos. 7949, 8111, 8150, 8473, 8695, and 10979) and the eight (8) proposed Additional Plaintiffs listed on Exhibit A (collectively, "Plaintiffs") in the above-captioned action. I am familiar with the facts and circumstances of this case and am admitted to practice in this Court.

2. Attached hereto as Exhibit A is a list of the plaintiffs to be added to the pending litigation in this case against the Taliban ("Additional Plaintiffs").

3. If this motion is granted, undersigned counsel intends to promptly move for a damages judgment against the Taliban on behalf of these additional plaintiffs.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion to Add Additional Plaintiffs Against the Taliban.

Dated: July 17, 2025
New York, New York

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.
Anderson Kill P.C.
7 Times Square, 15th Floor
New York, NY 10036
Email: jgoldman@andersonkill.com
Tel: 212-278-1000
Fax: 212-278-1733